



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

February 11, 2010

Sent Via US Mail and Email- chadparker@jacksonnc.org

Mr. Chad Parker
Jackson County Solid Waste Director
1172 Mineral Springs Drive
Sylva, NC 28779

Re: *Proposed Sample and Analysis Plan*
Jackson County Scott Creek MSW and C&D Transfer Facility, Permit # 50-03T

Dear Mr. Parker:

The Solid Waste Section has completed a review of the *Proposed Sample and Analysis Plan* submitted on February 3, 2010 on behalf of Jackson County by Municipal Engineering Services Co., P.A. for the Jackson County Scott Creek MSW and C&D Transfer Facility, Permit # 50-03T. The *Proposed Sample and Analysis Plan* was submitted pursuant to a Compliance Order With Administrative Penalty issued by the Division of Waste Management, Solid Waste Section on December 29, 2009 for the violation of 15A NCAC 13B .0402(3). The Compliance Order With Administrative Penalty stated that water that came in contact with solid waste (leachate) was not contained on site and not treated prior to discharge from the facility. In addition, leachate was discharged into the surface waters of Ochre Hill Creek, just before it empties into Scott Creek.

The *Proposed Sample and Analysis Plan* was submitted to the Solid Waste Section to evaluate the extent of the environmental impacts from the leachate release. The *Proposed Sample and Analysis Plan* consists of soil and surface water sampling. Potentially impacted soils will be identified by a hand auger at specific downgradient locations and field screened. The total number of soil samples will be determined in the field. A background soil sample will also be collected to characterize the baseline concentrations at the facility. Soil samples will be analyzed for Appendix I Volatile Organics and Metals, Nitrate-Nitrite, Phosphorus, Sulfate, Percent Solids, and pH. Please compare the analytical soil sampling results to NCDENR's Inactive Hazardous Sites Branch Health Based Soil Remediation Goals October 2009. In addition, surface water samples will be collected and analyzed for Appendix I Volatile Organics and Metals, Nitrate-Nitrite, Phosphorus, Sulfate, Percent Solids, and pH. Field parameters should also be collected. Based upon the results of the initial task activities, additional assessment, installation of groundwater monitoring wells, excavation of impacted soils, and/or corrective action may be necessary.

As a result, the *Proposed Sample and Analysis Plan* is approved as described with the condition that the surface water samples will also be analyzed for BOD and COD. Once all elements of the *Proposed Sample and Analysis Plan* are completed, please submit a written report of the findings to

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the Solid Waste Section within 30 days. If you have any questions or concerns regarding this letter, please contact me at 919-508-8500 or by email at jaclynne.drummond@ncdenr.gov. Thank you for your anticipated cooperation with this matter.

Sincerely,



Jaclynne Drummond
Hydrogeologist
Environmental Compliance
Solid Waste Section

cc: Mark Brown, Municipal Engineering
Wayne Sullivan, Municipal Engineering
Mark Poindexter, Field Operations Supervisor
Deb Aja, Western District Supervisor
Troy Harrison, Environmental Senior Specialist
Donald Herndon, Compliance Officer
Solid Waste Section Central Files